

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**COMMERCIAL STEAM CLEANING,  
L.L.C., ANDREW E. HAROLD, CARLOS  
HESS, and KATHY COLLINS**

**Plaintiffs,**

**v.**

**FORD MOTOR COMPANY and  
NAVISTAR INTERNATIONAL  
CORPORATION,**

**Defendants.**

**Civil Action No.: 2:09-cv-01009**

**DEFENDANT FORD MOTOR  
COMPANY'S REQUEST FOR  
PRODUCTION OF VEHICLE FOR  
INSPECTION TO NAMED PLAINTIFF  
KATHY COLLINS**

TO: Plaintiff Kathy Collins ("Collins"), by and through her attorney of record, Meyer, Ford & Glasser.

Pursuant to Federal Rule of Civil Procedure 34, Defendant Ford Motor Company ("Ford"), makes this demand upon Kathy Collins and her attorneys Stephen P. Meyer and Craig B. Giffin of Meyer, Ford & Glasser to produce any and all Ford vehicles that are or were equipped with 6.0-liter diesel engines sold by Ford within Collins's possession, custody or control, and on the basis of which Collins asserts any claims in the above-captioned action, for inspection by Ford's designated representatives. Ford further requests that Collins produce any and all parts or equipment that have, at any point in time, been attached to or removed from the above referenced vehicle(s), any records of maintenance for the vehicle(s), and any documentation of any government-mandated inspections that are within Collins's possession, custody or control.

The above-referenced things shall be presented by plaintiff for inspection by Ford's designated representative at a mutually agreed upon place, on March 11, 2010, at 9:30 a.m. or other mutually agreed upon date and time.

Dated this 19th day of February 2010.

**FORD MOTOR COMPANY**  
**By Counsel**

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***Counsel for Defendant Ford Motor Company***

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**CERTIFICATE OF SERVICE**

I, Michael Bonasso, counsel for the defendant, Ford Motor Company, do hereby certify that on the 19<sup>th</sup> day of February, 2010, the foregoing **DEFENDANT FORD MOTOR COMPANY'S REQUEST FOR PRODUCTION OF VEHICLE FOR INSPECTION TO NAMED PLAINTIFF KATHY COLLINS** was served upon the following counsel of record through the CM/ECF system as follows:

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/s/ Michael Bonasso  
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